

**Wittels
McInturff
Palikovic**

December 18, 2024

Via ECF

Honorable Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Swanson et al. v. Manhattan Beer Distributors, LLC et al.*, No. 15 Civ. 5383-ENV-TAM

Dear Judge Merkl:

As counsel for Plaintiff Larry Swanson and the proposed Class we write on behalf of all parties to request a 60-day extension of the current stay of all proceedings and deadline for the parties to file a motion for preliminary class settlement approval, from December 20, 2024, to February 18, 2025.

The parties have engaged in good-faith settlement discussions over the past few months and are hopeful we can reach agreement on all material terms, which will resolve this matter in its entirety. In order to provide necessary time for these negotiations to continue, and to account for anticipated delays associated with the upcoming holiday season, the parties respectfully request this extension of the stay and associated deadlines.

For these reasons, the parties respectfully request a 60-day extension of the stay and deadline to file a motion for preliminary class settlement approval, to February 18, 2025.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Steven L. Wittels
Steven L. Wittels

cc: All Counsel of Record (via ECF)